

# EXHIBIT C

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION**

CANDIS THOMAS,  
Plaintiff,

Case NO: 1:23-cv-12843  
JUDGE SUSAN K. DECLERCQ

v

HOLY CROSS SERVICES, INC.,  
Defendant.

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**MEDIATION AGREEMENT**

The parties participated in a mediation on this date with Kathleen L. Bogas and have agreed to resolve this matter under the following terms:

1. Defendant shall pay to Plaintiff and her attorney in settlement of this matter the total sum of \$125,000.00. Three payments will be made: \$25,000.00 no later than June 30, 2023, \$25,000.00 no later than September 30, 2023 and the remainder to be paid no later than December 31, 2023. With each payment three checks will issue: one to Plaintiff's attorney for fees and costs; one made payable to Plaintiff in the amount of 50% of the remainder with appropriate withholdings for lost wages and a W2 will issue; and one made payable to Plaintiff for the remaining 50% for other damages and a 1099 will issue.
2. Defense counsel will draft the settlement agreement and release and forward same to Plaintiff's counsel for review and approval. Standard terms will be included in the release.
3. Plaintiff will sign a settlement agreement and full release of any and all claims.
4. The parties will enter a stipulation and order of dismissal with prejudice with the court.
5. Plaintiff is not eligible for re-hire by Defendant.
6. Plaintiff will keep the terms of the agreement and the settlement amount confidential. However, she may tell her accountant, attorneys or if required by law.
7. Plaintiff will not disparage Defendant. Nothing in the agreement will prohibit truthful testimony or statements for purposes of medical/mental treatment.
8. If inquiry is made regarding Plaintiff, Defendant will only provide dates of employment and position held.

9. If the parties are unable to agree on language in the settlement agreement, they may contact me for assistance.

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CANDIS THOMAS,

Plaintiff

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HOLY CROSS SERVICES, INC.,

Defendant

DATED: April 19, 2024